

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

**LAYTHRON TILLIS, an Individual  
and ETHEL TILLIS, an Individual**

**PLAINTIFFS,**

**VS.**

**CECIL E. CAMERON, an Individual;  
HERTZ CLAIMS MANAGEMENT, a  
foreign corporation; THE HERTZ  
CORPORATION, a foreign  
corporation,**

**DEFENDANTS.**

**CASE NO.: 07-CV-78-WKW**

**RESPONSE TO MOTION FOR SUMMARY JUDGMENT  
FILED BY THE HERTZ CORPORATION**

Come now the Plaintiffs and in response to the Motion For Summary Judgment filed by The Hertz Corporation, say as follows:

1. The Plaintiffs have reviewed the law regarding the application of the Graves Amendment to the respondeat superior claims against this Defendant, the applicable law regarding that Federal Statute, as well as the evidence supporting the remaining claims against this Defendant, and are of the opinion that that Defendant's Motion is due to be granted.

WHEREFORE, for the above reasons, the Plaintiffs do not oppose the Motion for Summary Judgment filed by the Defendant The Hertz Corporation.

/s/Thomas B. Albritton  
Thomas B. Albritton ALB009  
Attorney for Plaintiffs

OF COUNSEL:

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CERTIFICATE OF SERVICE

I hereby certify that I have this date served a copy of the foregoing upon all counsel of record in this cause by electronic service if registered, and if not then by placing a copy of same in the United States mail, postage prepaid, addressed as follows on this, the 30th day of May, 2008:

Mr. David W. Henderson  
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/s/Thomas B. Albritton  
Of Counsel